

# EXHIBIT 253

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA**

STATE OF ARIZONA *et al*

PLAINTIFFS,

V.

CIVIL ACTION No. 6:22-cv-1130-Z

GARLAND *et al*,

## DISCLOSURE OF RODNEY SCOTT

DEFENDANTS.

Plaintiff States disclose Rodney Scott pursuant to Fed. R. Civ. P. 26(a)(2)(C) as an expert not retained or specially employed to provide expert testimony in this case.

1. Plaintiff States contemplate calling Mr. Scott to testify as a non-party regarding matters related to immigration policy and the Asylum IFR, the impact of the Asylum IFR on migration and States, and the consideration of those impacts (or lack thereof) in developing and issuing the Asylum IFR.

2. Plaintiffs expect Mr. Scott to testify as to the facts and opinions summarized below:

a. The Biden Administration consistently focused on expediting processing and increasing opportunities for migrants to enter the United States, and has acted to undermine border security.

b. The Biden Administration's immigration and border policies were developed and drafted by political appointees.

c. The Biden Administration did not seek advice from or ignored advice from experts regarding immigration and border policy, including with respect to the Asylum IFR.

d. Migration has exploded due to Biden Administration policies. Statistics released by the Biden Administration downplay the level of migration and releases into the interior.

e. The southwest border is in crisis, that crisis is attributable to actions taken by the Biden Administration, cartels effectively control who and what enters the United States, and the federal government lacks operational control of the southwest border.

- 1 f. The crisis and mass migration at the southwest border adversely impacts Plaintiff States.  
2 g. Other testimony consistent with Mr. Scott's testimony before Congressional committees.<sup>1</sup>

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5 Dated: September 25, 2023

Respectfully submitted,

6 **JEFF LANDRY**  
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28 <https://www.c-span.org/video/?528717-1/house-hearing-immigration-border-security>  
<https://www.c-span.org/video/?528250-1/hearing-biden-administrations-immigration-border-policies>  
<https://judiciary.house.gov/committee-activity/hearings/terrorist-entry-through-southwest-border>